



# MORROW COUNTY HEALTH DISTRICT

Excellence in Healthcare

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October 15, 2018

Federal Communications Commission

RE: Rural Health Care Program

- WC Docket No. 02-60
- HCP 15930

To Whom It May Concern,

We are requesting an appeal of the USAC/RHC rules for Funding Year 2017. On September 20, 2018 it was discovered that the Fund Year 2017 deadlines had passed. In response we immediately called USAC's RHC team. We talked to Eric O, who is part of the RHC-Assist Support Team. He informed us that due to the passed deadline, we would need to submit an appeal directly to the FCC.

In Fund Year 2015, this hospital (Pioneer Memorial Hospital) signed a three year Evergreen Contract with Inland Development Corporation. The contract was reviewed and approved by USAC staff. In Fund Year 2016, forms 466 and 467 were submitted for payment. Unfortunately Fund Year 2017 was missed in the submission of forms 466 and 467. We are asking for this appeal for Fund Year 2017 to allow for the submission and payment of forms 466 and 467. The total amount of monies we would be requesting, as was approved in Fund Year 2016, is \$35,280. I have attached the USAC funding commitment letters from Fund Year 2016 for verification of the monies requested.

In addition, we are requesting clarification as to why there is a need to do annual submissions on the Telecommunications side, but not on the Healthcare Connect Fund side, given the fact that we have an approved Evergreen contract. These different submission requirements create confusion and multiple deadlines for the participants, which is one of the reasons we missed the 2017 deadlines.

Morrow County Health District is a small, frontier, critical access healthcare system comprised of a 21-bed hospital facility, two rural health clinics, one school based clinic, county-wide Home Health and Hospice services, and a county-wide ambulance service. We are the only available healthcare option for most of Morrow and Gilliam counties. The amount of the funds in question is deeply needed and the lack of these funds would have a severe negative impact on our ability to provide care. These funds assist the hospital and District to continue to offer services to a very rural and isolated population in Eastern Oregon.

Pioneer Memorial Hospital & Nursing Facility	Pioneer Memorial Home Health & Hospice	Pioneer Memorial Clinic	Irrigon Medical Clinic	Ione Community Clinic	Morrow County Ambulance
P – (541) 676-9133 F – (541) 676-2901 TDD – (541) 676-2908	P – (541) 676-2946 F – (541) 676-9017	P – (541) 676-5504 F – (541) 676-9025	P – (541) 922-5880 F – (541) 922-5881	P – (541) 422-7128 F – (541) 422-7145	P – (541) 676-9133 F – (541) 676-2901

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The Information Services Department which covers all District owned locations throughout Morrow County has been staffed by only me for the last 10 years. Two years ago, I had to assume the duties of Informatics on top of the role of Information Services. Due to our lack of available staff in this rural location, I am also a volunteer Emergency Medical Technician for the County's Ambulance Service. When I am on call and there is a need for an ambulance, I am required to stop the Information Services work and start doing my EMT work. This is not ideal, but it is needed, as the care of our patients take priority over all other work.

In May 2017, I was finally able to hire a help desk technician to assist in the growing needs for the Information Services Department. As the local population has increased and the District has expanded to meet the population needs, the Information Services Department has seen a 58% increase in help requests from the prior year. This amounts to 499 requests for this last fiscal year. The Department handles requests ranging from computer issues to phone/fax issues to servers, as well as managing the District's mandated Electronic Health Records program. This combination of duties and lack of staffing has overwhelmed our department.

The District has participated in USAC funding requests for well over the last 11 years. We have met the submission deadlines for each year except for last year. In order to meet future USAC deadlines for submissions, I have populated my Outlook calendar to show when the deadlines are due.

My hope is that the appeal will be granted, so we have the opportunity to continue to provide the critical services this District offers to the public.

I would like to thank you for taking the time to consider this appeal. If you have any questions, please feel free to contact me. My information is below.

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